

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

Kolby Duckett, David Schilling and David Holloway

Plaintiffs

v.

Chief Brian Hickman, Ted Rogers and the City of
Collegedale

Defendants

Civil Action No. 1:19-cv-00295

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Curtis Bowe

707 Georgia Avenue #301, Chattanooga, TN 37402

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: any and all communications (emails and other written forms of communication) with members of the City of Collegedale Administration (i.e. Chief Brian Hickman, Ted Rogers, City Commissioners, Mayor, Vice Mayor, Chief James Hardeman, Lt. Jack Sapp, Sgt. Jamie Heath, and Sgt. Mike Westfield) regarding "performance standards", pending litigation against the City of Collegedale, "monthly statistics," "enforcement activities," "patrol activities," "officer productivity," "Stat Sheets," and "quota."

Place: Davis & Hoss, P.C.
850 Fort Wood Street
Chattanooga, TN 37403

Date and Time:

30 days upon receipt

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 05/01/2020

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)*

Kolby Duckett, David Schilling and David Holloway, who issues or requests this subpoena, are:

Janie Parks Varnell, 850 Fort Wood Street, Chattanooga, TN 37403, janie@davis-hoss.com, (423) 266-0605.

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:19-cv-00295

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any) _____
on (date) _____.

☒ I served the subpoena by delivering a copy to the named person as follows: Curtis Bowe
via hand delivery
_____ on (date) May 6, 2020 ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature
Scott Clifton, Paralegal
Printed name and title

850 Fort Wood St. Chattanooga, TN 37403
Server's address

Additional information regarding attempted service, etc.: